

Timothy T. Pridmore; SBN: 00788224
Todd J. Johnston; SBN: 24050837
MCWHORTER, COBB & JOHNSON, LLP
1722 Broadway (79401)
P. O. Box 2547
Lubbock, Texas 79408

806/762-0214; 806/498-4808 (fax)

Attorneys for Debtors/Defendants/Counter-Plaintiffs/Third-Party Plaintiffs/Third-Party Defendants 2B Farms, a Texas General Partnership, Terry M. Robinson, Rebecca A. Robinson and Non-Debtor, Angela Robinson

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

In re:	§	
	§	
McClain Feed Yard, Inc., et al.,	§	Case No. 23-200-84-swe7
<i>Debtors.</i>	§	Jointly Administered
	§	
In re:	§	
	§	
2B Farms, a Texas General	§	Case No. 23-50096-swe12
Partnership, et al.,	§	Jointly Administered
<i>Debtors.</i>	§	
	§	
AgTexas Farm Credit Services, Ag Texas PCA,	§	
Thorlakson Diamond T Feeders, LP,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Adversary Case No. 24-02007-swe
	§	Consolidated Adversary Proceeding
Edward Dufurrena, et al.,	§	
<i>Intervenor-Plaintiffs,</i>	§	
	§	
v.	§	
	§	
Rabo AgriFinance, LLC, et al.,	§	
<i>Defendants.</i>	§	
	§	
HTLF Bank, as successor to	§	
First Bank & Trust,	§	
<i>Plaintiff, Counter-Defendant, and</i>	§	

<i>Cross-Claim Defendant,</i>	§	
	§	
v.	§	
	§	
2B Farms, a Texas General Partnership,	§	Adversary Case No. 24-02007-swe
Terry M. Robinson, and Rebecca A. Robinson,	§	Consolidated Adversary Proceeding
<i>Defendants, Counter-Plaintiffs,</i>	§	
<i>Third-Party Plaintiffs and Third-Party</i>	§	
<i>Counterclaim Defendants,</i>	§	
	§	
v.	§	
	§	
Rabo AgriFinance, LLC and Mechanics Bank,	§	
<i>Third-Party Defendants.</i>	§	

DEBTORS 2B FARMS, A TEXAS GENERAL PARTNERSHIP, TERRY M. ROBINSON AND REBECCA A. ROBINSON’S JOINDER IN PLAINTIFFS’ AND INTERVENOR-PLAINTIFFS’ EMERGENCY MOTION TO EXTEND DEADLINES TO RESPOND TO CERTAIN MOTIONS TO DISMISS AND TO CONTINUE ALL HEARINGS ON SAME

TO THE HONORABLE JUDGE EVERETT:

2B Farms, a Texas General Partnership, Terry M. Robinson and Rebecca A. Robinson (collectively, “**2B Farms**” and/or “**Debtors**”) submit this *Joinder in Plaintiffs AgTexas Farm Credit Services, AgTexas PCA, and Thorlakson Diamond T. Feeders, LP and Intervenor-Plaintiffs’ Emergency Motion to Extend Deadlines to Respond to Certain Motions to Dismiss and to Continue All Hearings On Same* [Dkt. No. 160] (the “**Motion**”), and respectfully show the Court the following:

1. 2B Farms is similarly situated as the above-referenced Plaintiffs and Intervenor-Plaintiffs in that it currently has pending a response due to the Chapter 7 Trustee’s *Motion to Intervene and Motion to Enforce Automatic Stay* (“**Motion to Intervene**”) [Dkt. No. 140], while at the same time facing deadlines to respond to three Motions to Dismiss filed by Rabo AgriFinance, LLC, Mechanics Bank and HTLF Bank (response already filed)(collectively, the “**Motions to Dismiss**”). All of these matters are currently set for hearing on the Court’s June 30, 2025 docket.

2. 2B Farms agrees with and joins in the Plaintiffs' and Intervenor-Plaintiffs' Motion and argument that the best use of time and resources of all involved is for the Court to decide the threshold questions of standing before adjudicating the substantive Motions to Dismiss.

3. For the reasons set forth above, 2B Farms, a Texas General Partnership, Terry M. Robinson and Rebecca A Robinson respectfully request that the Court continue the deadlines for 2B Farms to respond to the Motions to Dismiss, continue consideration of the pending hearings on the Motions until after it has heard and ruled on the Trustee's Motion to Intervene, and for such further relief to which they may be entitled to at law or in equity.

Respectfully submitted,

MCWHORTER, COBB & JOHNSON, L.L.P.

1722 Broadway

P.O. Box 2547

Lubbock, Texas 79408

(806) 762-0214 - Telephone

(806) 762-8014 – Facsimile

Timothy T. Pridmore

SBN: 00788224

tpridmore@mcjllp.com

Todd J. Johnston

SBN: 24050837

tjohnston@mcjllp.com

By: /s/ Timothy T. Pridmore

Timothy T. Pridmore

**ATTORNEYS FOR DEFENDANTS, COUNTER-
PLAINTIFFS, THIRD-PARTY PLAINTIFFS AND
THIRD-PARTY DEFENDANTS 2B FARMS, A
GENERAL TEXAS PARTNERSHIP, TERRY
ROBINSON, REBECCA ROBINSON, AND ANGELA
ROBINSON**

CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2025, the foregoing document was filed with the Clerk of the Court in the foregoing case using the CM/ECF system, which sent notice of electronic filing to all electronic filing users in this case.

/s/ Timothy T. Pridmore
Timothy T. Pridmore